

AO 89B (07/16) Subpoena to Produce Documents, Information, or Objects in a Criminal Case

UNITED STATES DISTRICT COURT

for the
District of Massachusetts

United States of America)

v.)

SAMUEL MONTRONDE)

Case No. 23-cr-10079-FDS)

Defendant)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR
OBJECTS IN A CRIMINAL CASETo: Takeda Pharmaceuticals 500 Kendall St. Cambridge MA 02142
c/o Atty. Adam Bookbinder, Choate Hall & Stewart LLP
(Name of person to whom this subpoena is directed)YOU ARE COMMANDED to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects: In lieu of personal appearance, please send the following to: Shea & LaRocque LLP, 88 Broad St. Ste. 101, Boston MA 02110
(See attached for description)Place: U.S. District Court
1 Courthouse Way
Boston MA 02210

Date and Time:

11/08/2024 - 3:10 pm

Certain provisions of Fed. R. Crim. P. 17 are attached, including Rule 17(c)(2), relating to your ability to file a motion to quash or modify the subpoena; Rule 17(d) and (e), which govern service of subpoenas; and Rule 17(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

(SEAL)

Date: 11/01/2024

Certified to be a true and
correct copy of the original
Robert M. Farrell, Clerk
U. S. District Court
District of Massachusetts
By: Deputy Clerk

Date: 11/01/2024

CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (name of party) Samuel Montronde, who requests this subpoena, are:

Mark W. Shea, 88 Broad St. Ste. 101, Boston MA 02110 markwshea@shearock.com 617-577-8722

Notice to those who use this form to request a subpoena

Before requesting and serving a subpoena pursuant to Fed. R. Crim. P. 17(c), the party seeking the subpoena is advised to consult the rules of practice of the court in which the criminal proceeding is pending to determine whether any local rules or orders establish requirements in connection with the issuance of such a subpoena. If no local rules or orders govern practice under Rule 17(c), counsel should ask the assigned judge whether the court regulates practice under Rule 17(c) to 1) require prior judicial approval for the issuance of the subpoena, either on notice or ex parte; 2) specify where the documents must be returned (e.g., to the court clerk, the chambers of the assigned judge, or counsel's office); and 3) require that counsel who receives produced documents provide them to opposing counsel absent a disclosure obligation under Fed. R. Crim. P. 16.

Please note that Rule 17(c) (attached) provides that a subpoena for the production of certain information about a victim may not be issued unless first approved by separate court order.

sheaandlarocque

88 Broad Street, Suite 101
Boston MA 02110
617.577.8722

Via email: abookbinder@choate.com

November 4, 2024

Takeda Pharmaceuticals
500 Kendall Street
Cambridge MA 02142

c/o Adam Bookbinder, Esq.
Choate Hall & Stewart LLP

Re: *United States v. Samuel Montronde*
USDC Docket No. 23-cr-10079-FDS

DESCRIPTION OF ITEMS REQUESTED:

The entire Cellebrite phone extraction report(s) of Priya Bhambi's phone:
Samsung SM-S901U, conducted on or about 11/08/2022;
All file names;
Any EY searches of the Samsung SM-S901U phone initiated by Jeremy Horowitz;
All documents created by Jeremy Horowitz regarding the search of the phone and
any searches of Priya Bhambi's computer(s).

The entire image / extraction of Priya Bhambi's laptop (owned by Takeda),
conducted on or about 11/08/2022;
All file names;
Any searches of the laptop computer;
All documents regarding any search of the laptop.

**In lieu of personal appearance, you may provide a copy of the requested
documentation by 3:00p.m. on November 8, 2024 to:**

Shea & LaRocque, LLP
88 Broad Street, Suite 101
Boston MA 02110

I am enclosing an FBI form FD-302 (Bates No. USAO_00037905 to USAO_00037907), which describes the imaging of the laptop and phone.

This subpoena replaces the subpoena served on November 1, 2024.

Thank you for your cooperation in this matter. Please feel free to contact me with any questions or concerns. I can be reached at 617-577-8722 or markwshea@shearock.com.

Sincerely,

/s/ Mark W. Shea

Mark W. Shea

Enc.

cc: AUSA Leslie Wright
AUSA Mackenzie Queenin